UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

ACKNOWLEDGEMENT AND RECORD OF SPCC/FRP INSPECTION/PLAN REVIEW

SPCC CASE NUMBER:_____ FRP REGIONAL ID#:_____ DATE:_____

TO: Vincent E. Zenone, OSC/SPCC Coordinator (3HW34)
CC: Linda J. Ziegler, FRP Coordinator (3HW34) (only if FRP applicable)

Inspector's Printed Name/Signature: _____

~~Inspection Team Members:~~ SERVICE WELDING & SHIP BUILDING

Name/Location of Facility: BOTH { EAGAN MARINE CORP

Address: PO Box 669

City: LAMONT County: _____ State: _____ Zip: 60439

Facility Contact/Title: DENNIS EAGAN

Telephone Number: N 41° 41' 06.4" W 87° 59' 15.9"

Name of Owner/operator: _____

Address: _____

City: _____ State: _____ Zip: _____

Telephone Number: _____

** See pages 12 to 14 for FRP only information

Synopsis of business operations: _____

Route of entry and estimated distance to waterway: _____

Acknowledgement:

I acknowledge that an SPCC/FRP inspection of this facility was conducted on the ____ day of _____, 19__.

Facility Representative Printed Name/Signature: _____

NOTE: During this inspection the owner/operator of the facility was asked to provide an extra copy of the SPCC Plan, which will be submitted with this report to the SPCC Coordinator. An extra copy of the SPCC Plan was provided to the inspector (Y/N). If no, the owner/operator of the facility has been asked to send a copy of the SPCC Plan, if available, via certified mail, return receipt requested, within 14 days of the date of this inspection to the SPCC Coordinator (mail code 3HW34) at the address on this letterhead (Y/N).

[original of this page to SPCC coordinator, copy to facility representative]

Type of Facility (check all applicable descriptions):

☐	onshore	☐	commercial
☐	offshore	☐	agricultural
☐	oil well drilling	☐	public
☐	oil production	☐	waste treatment
☐	oil refining	☐	loading racks
☐	oil storage	☐	vehicles/rail cars (in-facility)
☐	industrial	☐	pipelines (in-facility)

Date of facility start operations: _____

Date facility first required plan: _____

Oil storage capacity aboveground: _____ gallons

Oil storage capacity underground: _____ gallons

SPCC Plan prepared: No ** FRP Plan Prepared: _____

SPCC Plan available for review: _____ ** FRP Plan Available: _____

Facility normally attended at least 8 hours: 24hrs N/O

SPCC Plan Certified (seal affixed): ✓

Date Certified: _____

Name of Engineer: _____

License Number: _____ State: _____

SPCC Plan reviewed every three years: _____

Record of SPCC Plan review available: _____

Date(s) of Review(s): _____

Spill of more than 1000 gallons in past 12 months: _____

If yes, date of spill: _____ Was Plan submitted per 40 CFR 112.4: _____

Two spills of harmful quantity in past 12 months: _____

If yes, dates of spills: _____ Was Plan submitted per 40 CFR 112.4: _____

Has there been a change in facility design, construction, operation, maintenance which could affect the facility's potential for discharge? If so, describe: _____

Date of Latest Change: _____ Date Plan Amended: _____

[shaded areas represent FRP/SPCC information, ** represents FRP information only] (8/12/94)

Plan includes a prediction of equipment failure(s) which could result in a discharge from the facility per 40 CFR 112.7(b): ..... ☐

Plan discusses appropriate containment and/or diversionary structures or equipment [see page 10 for examples] per 40 CFR 112.7(c): ..... ☐

Installation of structures or equipment listed in 112.7(c) was determined to be impracticable: ..... ☐

If yes, impracticability clearly demonstrated: ..... ☐

If yes, contingency plan per 40 CFR 109 provided: ..... ☐

If yes, written commitment provided: ..... ☐

General notes/comments: _____

_____

_____

_____

_____

The following information directly reflects the requirements of 40 CFR 112 as applicable to the facility inspected.

The SPCC Plan must include complete discussion of the following [applicable] guidelines, spill prevention, containment procedures, or State rules, regulations or guidelines (if more stringent):

Facility Drainage, Onshore (excluding production facilities):

a. from diked storage areas via valves: ..... ☐

valves manually operated: ..... ☐

b. from diked storage areas via pumps or ejectors: ..... ☐

pumps or ejectors manually operated: ..... ☐

c. storm water inspected prior to discharge: ..... ☐

d. from undiked areas into catchment basins: ..... ☐

e. if dikes or catchment basins are not utilized, is there a diversion system to return spills to the facility: ..... ☐

f. is drainage water treated at the facility: ..... ☐

Inspector's comments on Facility Drainage, Onshore (excluding production facilities), based upon inspection:

_____

_____

_____

_____

_____

Bulk Storage Tanks, Onshore (excluding production facilities):

a. Material and construction of tanks compatible to the oil stored and the conditions of storage: STEEL / VEG. OIL / DIESEL / X50H / OIL ?

b. All Tank installations have secondary containment: NS

c. Secondary containment appears to be adequate: NO

d. Diked areas are sufficiently impervious: NO

e. Drainage from diked areas to on-site treatment: YES

If no, is the bypass valve normally sealed closed: NO

Drainage from diked area is inspected: BAD, OILY, NEW GRAVEL /

Bypass valve is opened and resealed properly:

Adequate records of dike drainage are maintained:

f. Underground tanks at this facility: NONE

Protected from corrosion:

Pressure tested periodically:

g. Partially buried tanks at this facility: NONE

Buried sections protected from corrosion:

h. Aboveground tanks at this facility: NUMEROUS

Subject to periodic integrity testing: NO

Records of inspections maintained: DAILY, NO PROTOCOL, NO WRITTEN

Internal heating coils utilized:

If yes, steam return/exhaust monitored: VISUAL

External heating system utilized:

Tanks are "fail-safe" engineered:

Audible high liquid level alarm: NO

Visual high liquid level alarm:

Automatic high liquid level pump cutoff: Y

Communications between gauger and pumping station: YES

System of determining liquid level in tanks such as

sensing devises: VISUAL

Direct vision gauges:

Sensing devises and/or gauges regularly tested:

i. Effluent discharges directly to navigable waters observed frequently to detect oil spills: DAILY

j. Causes of oil leaks resulting in accumulations of oil in diked areas are promptly corrected:

k. Mobile or portable tanks at this facility: YES

If yes, are positioned properly: NA

A secondary means of containment is utilized:

Inspector's comments on Bulk Storage Tanks, Onshore (excluding production facilities), based upon inspection:

SANITARY SEWER GETS PUMPED OUT

SATELLITE UNITS

SPILL RESP - ALL MOBILE BUT WHSE STORAGE

3TO 400 BAGS OIL DRY COVERS OPA FOR VESSELS

Facility Transfer Operations, Pumping and In-Plant Processes, Onshore (excluding production facilities):

a. Buried pipelines are corrosion protected: .....

b. Not-in-service pipelines are capped or blank-flanged, and marked as their origin: .....

c. Pipe supports are designed to minimize abrasion and corrosion, and allow for expansion and contraction: .....

d. Aboveground pipelines are inspected regularly: .....

e. Periodic pressure testing is conducted: No.

f. Vehicle traffic warned of aboveground pipelines: No.

TRUCK ROUTES

Inspector's comments on Facility Transfer Operations, Pumping and In-Plant Processes, Onshore (excluding production facilities), base upon inspection:

TRUCK TRANSFERS TAKE PLACE AT NUMEROUS LOCATIONS, NO SET LOCATION FOR LOADING/UNLOADING.

FRONT 7 ARE ATTACHED

Facility Tank Car and Tank Truck Loading/Unloading Rack, Onshore:

a. Rack drainage flows to catchment basin: .....

b. Rack drainage flows to treatment system: ..... / No

If no (a or b), is secondary containment used: .....

c. Is a system used to prevent vehicular departure before complete disconnect from transfer lines: ..... /

interlock warning lights: ..... / No

physical barrier system: .....

warning signs: .....

d. Vehicle inspection before departing facility: DRIVERS ONLY

NO SET PROCEEDURE

Inspector's comments on Facility Tank Car and Tank Truck Loading/Unloading Rack, Onshore, based upon inspection

Oil production Facilities, Onshore:

a. Drainage from secondary containment systems at tank batteries and central treatment stations are closed and sealed at all times except when rainwater is being drained: .....

b. Prior to drainage, accumulated oil on the rainwater is picked up and returned to storage or disposed of: .....

c. Field drainage ditches, road ditches, and oil traps, sumps or skimmers are regularly inspected for oil: .....

Accumulated oil is removed: .....

d. Aboveground tanks at this facility: .....

Material and construction are compatible with the oil stored and the conditions of storage: .....

Secondary means of containment appears adequate: .....

Tank inspections are conducted periodically: .....

By a competent person: .....

Includes tank foundation and supports: .....

Tank battery installations fail-safe engineered: .....

Adequate tank capacity to prevent tank overfill: .....

Overflow equalizing lines between tanks: .....

Vacuum protection to prevent tank collapse: .....

High level alarms: .....

e. Facility transfer operations at this facility: .....

Abeveground valves/pipelines examined periodically: .....

Brine disposal facilities examined often: .....

Flowline maintenance program established: .....

Records of inspection maintained: .....

Inspector's comments on Oil Production Facilities, Onshore, based upon inspection:

Oil Drilling and Workover Facilities, Onshore:

a. Mobile drilling/workover equipment positioned to prevent spilled oil from entering waters: .....

b. Secondary containment utilized: .....

c. Blowout prevention (BOP) assembly utilized: ..... *

d. Well control system utilized: ..... *

NOTE: casing and BOP installations should be in accordance with State regulatory agency requirements

Inspector's comments on Oil Drilling and Workover Facilities, Onshore, based upon inspection:

Oil Drilling and Workover Facilities, Offshore:

a. Oil drainage collection equipment utilized: ? ☐
Drains controlled/directed to central collection: NO ☐
b. Sump system, if used, adequate sized: NO ☐
Spare pump/equivalent method available: ☐
c. Separators/treaters equipped with dump valves: NO ☐
Measures in place should dump valve fail: ☐
d. Atmospheric storage/surge tanks equipped with high level sensing devices: ☐
e. Pressure tanks equipped with high and low pressure sensing devices: ☐
f. Tanks are corrosion protected: SOME ORIGINAL ☐
g. Written procedure for inspecting and testing pollution prevention equipment and systems prepared: HYDROSTATIC TEST DONE ☐
Written procedure maintained at the facility: BY EMC ☐
Written procedure included in SPCC Plan: N/A ☐
Inspections and tests conducted periodically: DAILY, NO SET PROCEDURE ☐
h. Surface and subsurface well shut-in valves and devices are sufficiently described: ☐
Detailed records for each well maintained: N/A ☐
i. Blowout prevention (BOP) assembly utilized in accordance with State regulatory agency requirements: ☐
j. Well control measures provided in the event of emergency conditions: ☐
k. Written instructions are prepared for contractors and subcontractors by the owner or operator: ☐
Such instructions are maintained at the facility: ☐
l. Manifolds are equipped with check valves: ☐
m. Flowlines are equipped with high pressure sensing device and shutin valve at the wellhead: N/A ☐
If no, a pressure relief system is provided: ☐
n. Pipelines are corrosion protected: ☐
o. Sub-marine pipelines are stress protected: ☐
Sub-marine pipelines are inspected periodically: ☐
Inspections are documented and maintained: ☐

Inspector's comments on Oil Drilling and Workover Facilities, Offshore, based upon inspection:

Inspection and Records

a. Inspections required by 40 CFR 112 are in accordance with written procedures developed for the facility: NO

b. Written procedures and a record of inspections are signed by the appropriate supervisor or inspector: NO

c. Written procedures and a record of inspections are made part of the SPCC Plan: NO

d. Written procedures and a record of inspections are maintained for a period of three years: NO

Inspector's comments on Inspections and Records, based upon inspection:

NO SET SCHEDULE FOR INSPECTIONS AND NO SET PROCEEDURES, NO RECORDS OF INSPECTIONS.

Security (excluding oil production facilities):

a. Facility is fully fenced: ~~YES~~ NO

b. Entrance gates locked and/or guarded: GAURD - WORKERS

c. Master flow and drain valves secured in closed position when in a non-operating or non-standby status: NO LOCKS

d. Starter control on pumps locked in the "off" position or located at a site accessible only to authorized personnel when in a non-operating or non-standby status: TRAINED EMPLOYEES

e. Loading/unloading connection of pipelines are capped or blank-flanged when not in service: CAPPED ON TRUCKS, OTHERWISE NO

f. Facility lighting appears to be adequate to facilitate the discovery of spills during hours of darkness and to deter vandalism: YES

Inspector's comments on Security (excluding oil production facilities), based upon inspection:

LIGHTING GOOD, NOT ADEQUATE FENCE!

Personnel Training and Spill Prevention Procedures: SOME 40 Hr TRAINED

a. Designated person accountable for spill prevention: NO

b. Spill prevention briefings scheduled periodically: NO

X c. Personnel training records: NO

•• d. Mock alert drill records: NO N/A

Inspector's comments on Personnel Training and Spill Prevention Procedures, based upon inspection:

Aboveground Storage Tank and Appurtenances Inspection Checklist:

1. Check Tanks for leaks, specifically looking for
   - a. Drip marks and stains ..... YES
   - b. Discolorations of tanks ..... YES
   - c. Puddles of stored material ..... YES
   - d. Corrosion ..... YES
   - e. Cracks ..... No
   - f. Localized dead vegetation ..... YES

2. Check Foundations for
   - a. Cracks ..... YES
   - b. Settling .....
   - c. Gaps between tank and foundation .....
   - d. Puddles of stored material .....
   - e. Discoloration .....

3. Check pipes and valves for
   - a. Droplets of stored material ..... YES
   - b. Discoloration ..... YES
   - c. Corrosion ..... YES
   - d. Bowing of pipes between supports ..... No
   - e. Presence of stored material on valves ..... YES
   - f. Evidence of leakage at joints and seams ..... YES
   - g. Localized dead vegetation ..... YES

Inspector's comments on Aboveground Storage Tank and Appurtenances, based upon inspection:

UNDER 27K TANKS GROUND SAT'D WITH OIL GREEN/BROWN/BLACK SMEARS OF ROTTING OIL (VEG.)

Inspector's comments on Underground Storage Tank and Appurtenances, based upon inspection:

NONE

Secondary Containment Checklist:

1. Secondary Containment (dike or berm system)
   - a. Capacity appears adequate ..... NO
   - b. Drainage mechanism manually operated ..... ?
   - c. Sufficiently impervious to stored materials ..... NO FLOODING
   - d. Presence of stored material within dike or berm ..... YES
   - e. Standing water within dike or berm ..... YES
   - f. Debris within the dike or berm area ..... YES
   - g. Erosion or corrosion of dike or berm ..... YES

2. Secondary Containment (other systems such as moat, catch-basin, pond, etc)
   - a. Capacity appears adequate ..... NO
   - b. Drainage mechanism manually operated ..... ~~NO~~ YES
   - c. Presence of stored material within secondary containment ..... YES
   - d. Standing water within the secondary containment system ..... YES
   - e. Debris within the secondary containment system ..... YES
   - f. Erosion or corrosion of the secondary containment system ..... YES

3. Secondary Containment (drainage systems)
   - a. Drainage adequate to return spilled material to facility ..... No

4. Secondary Containment (none or inadequate)
   - a. Demonstration of impracticability ..... NO
   - b. Contingency Plan developed per 40 CFR 109 ..... NONE
   - c. Written commitment ..... NO

Inspector's comments on Secondary Containment, based upon inspection:

Has the facility completed its Certification of Substantial Harm Determination form and made it part of the SPCC Plan: Yes ☐ No ☒

If yes, no further action anticipated.

If no, provide the owner or operator the copy of the form below.

This form must be completed, certified, and attached to the SPCC Plan to be submitted to the SPCC Coordinator (see page 1).

Certification of the Applicability of the Substantial Harm Criteria

Facility Name: EAGAN MARINE CORP

Facility Addresses: SANITARY DRAINAGE & SHIP CANAL LAMONT IA

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
   Yes ☒ No ☐

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
   Yes ☒ No ☐

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such as that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 10, for availability) and the applicable Area Contingency Plan.
   Yes ☒ No ☐

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such that a discharge from the facility would shut down a public drinking water intake[2]?
   Yes ☐ No ☒

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
   Yes ☐ No ☐ UNKNOWN

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature: _____ Name (Please type or print): _____

Title: _____ Date: _____

[1] If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

[2] For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).